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**Marquis Aurbach**

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Attorneys for Defendant LVMPD

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SONIA ESPARZA, individually and as  
Special Administrator of the Estate of  
FERNANDO MARTINEZ JR.,

Plaintiffs,

vs.

WELLPATH, LLC; LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT; SHERIFF KEVIN  
MCMAHILL; DEPUTY CHIEF FRED  
HAAS; DOES 1-20,

Defendants,

FERNANDO MARTINEZ SANTOS

Nominal Defendant.

Case Number: 2:23-cv-02161-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS SHERIFF  
KEVIN MCMAHILL AND FRED  
HAAS'S RESPONSIVE PLEADING TO  
PLAINTIFFS' FIRST AMENDED  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiffs, Sonia Esparza, individually, and as Special Administrator for the Estate of Fernando Martinez, Jr. ("Plaintiffs"), by and through their counsel of record, Peter Goldstein Esq., of Peter Goldstein Law Corp. and Defendants, Sheriff Kevin McMahonill and Fred Haas's ("Defendants"), by and through their counsel of record, Craig R. Anderson, Esq. and Kaden P. Killpack, Esq., of Marquis Aurbach, hereby agree and jointly stipulate to the following:

1. Defendants Sheriff Kevin McMahonill and Fred Haas were served with the First Amended Complaint on May 29, 2024 [ECF No. 33];

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1 2. Defendants Sheriff Kevin McMahonill and Fred Haas' response to Plaintiffs'  
2 First Amended Complaint is due June 20, 2024;

3 3. Defendants Sheriff Kevin McMahonill and Fred Haas are unable to meet the  
4 deadline of June 20, 2024 to file a response to Plaintiffs' First Amended Complaint;

5 4. The Parties have agreed to a two-week extension for Defendants Sheriff  
6 Kevin McMahonill and Fred Haas to respond to Plaintiffs' First Amended Complaint;

7 5. Accordingly, the deadline for Defendants Sheriff Kevin McMahonill and Fred  
8 Haas' response to Plaintiffs' First Amended Complaint, currently due on June 20, 2024, be  
9 extended to and include Friday, July 5, 2024;

10 6. This is the Parties' first request to extend the deadline for Defendants Sheriff  
11 Kevin McMahonill and Fred Haas' response to Plaintiffs' First Amended Complaint; and

12 7. This Stipulation is being entered in good faith and not for purposes of delay.

13 IT IS SO STIPULATED.

14 Dated this 20th day of June, 2024  
15 PETER GOLDSTEIN LAW CORP

16 By: /s/ Peter Goldstein  
17 Peter Goldstein, Esq.  
18 Nevada Bar No. 6992  
19 10161 Park Run Drive, Suite 150  
20 Las Vegas, Nevada 89145  
21 Attorneys for Plaintiffs

Dated this 20th day of June, 2024  
MARQUIS AURBACH

By: /s/ Kaden P. Killpack  
Craig R. Anderson, Esq.  
Nevada Bar No. 6882  
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10001 Park Run Drive  
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Attorneys for Defendants LVMPD,  
McMahonill and Haas

22 **ORDER**

23 The above Stipulation is hereby GRANTED.

24 IT IS SO ORDERED:

25  
26   
27 UNITED STATES MAGISTRATE JUDGE  
28

DATED: 6-21-24